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## MEMORANDUM ENDORSED

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**LAW DEPARTMENT**  
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April 21, 2025

***Via ECF***

The Honorable Gregory H. Woods  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: Satchell v. City of New York, et al., No. 23 CV 11119 (GHW)**

Dear Judge Woods:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, Muriel Goode-Trufant, attorney for the Defendant City of New York ("the City") in the above-referenced action. I write to respectfully request a brief, 1-week extension of the briefing schedule on the City's motion to dismiss the operative complaint in this action.

As the Court will recall, the City filed a pre-motion letter on or about March 28, 2025, seeking leave to make a motion to dismiss pursuant to Rule 12 of the Federal Rules of Civil Procedure. (ECF No. 31.) The court set a briefing schedule, with the City's initial moving papers to be filed by today April 21, 2025. (ECF No. 32.)

Unfortunately, on Thursday of last week, my office received an unusual and unexpected emergency order to show cause arising in connection with a criminal proceeding in State court. I was assigned to handle this order to show cause and to appear at its return date later this week. This order to show cause has resulted in the unexpected interruption of my regular work and the diversion of time and attention to develop the legal response to the order but also to coordinate operational responses to it at the agency level. As such, I have not been able to finalize the City's motion to dismiss and thus respectfully request an additional week to do so, along with a concomitant extension of the motion briefing schedule.

This is the City's first request for an extension of the briefing schedule on its motion to dismiss. The requested extension would move the City's deadline to file its motion from today to April 28, 2025; the Plaintiff's opposition deadline to May 26, 2025; and the City's reply deadline to June 9, 2025. Due to Plaintiff's incarcerated and *pro se* status, I have not been able to acquire his consent in advance of this application.

I apologize to the Court that this request is made fewer than two business days before the motion filing deadline, in contravention of the Court's Individual Rules of Practice. As noted, the aforementioned order to show cause was issued on Thursday of last week, and the 'all hands on deck' response to that order in the time since has resulted in my not being able to make the instant application timely. I sincerely apologize for this oversight.

I thank the Court for its consideration of this matter.

Respectfully yours,

/s/ David S. Thayer


David S. Thayer

cc: ***Via First-Class Mail***  
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CLINTON CORRECTIONAL FACILITY  
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Dannemora, NY 12929  
*Plaintiff pro se*

Application granted in part. The deadline for the City to file its motion to dismiss is extended to April 28, 2025. Plaintiff's opposition is due four weeks following the date of service of the City's motion. The City's reply, if any, is due no later than two weeks following the date of service of Plaintiff's opposition. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 34 and to mail a copy of this order to Plaintiff by certified mail.

SO ORDERED.

Dated: April 21, 2025  
New York, New York

  
GREGORY H. WOODS  
United States District Judge